

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

THE CITY OF MEMPHIS and CHIEF
CERELYN J. DAVIS,

Movants.

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UNITED STATES OF AMERICA,
Plaintiff,

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)
)

v.

CASE NO. 2:23-cr-20191-SHL

)

EMMITT MARTIN, III, et al.,

)

Defendants.

)

)

**THE CITY OF MEMPHIS’S AND CHIEF C.J. DAVIS’S NOTICE REGARDING
MOTION TO INTERVENE AND PERMIT ACCESS TO SEALED DOCUMENTS AND
REQUEST FOR EXPEDITED HEARING**

Non-party Movants, the City of Memphis (the “City”) and Chief Cerelyn J. Davis (“Chief Davis”) (collectively, the “City Movants”), hereby respectfully submit an amended certificate of consultation regarding the City Movants’ Motion to Intervene and Permit Access to Sealed Documents (ECF No. 890). The Amended Certificate of Consultation is filed contemporaneously with this Notice.

Additionally, the City Movants respectfully request an expedited hearing regarding their Motion to Intervene and Permit Access to Sealed Documents.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

/s/ Bruce McMullen

Bruce McMullen (#18126)
Jennie Vee Silk (#35319)
Kelsey W. McKinney (#40434)
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
Telephone: (901) 526-2000
bmcullen@bakerdonelson.com
jsilk@bakerdonelson.com
kmckinney@bakerdonelson.com

*Attorneys for Movants, the City of Memphis
and Chief Cerelyn Davis*

CERTIFICATE OF SERVICE

I, Bruce McMullen, hereby certify that on June 27, 2025, I served a copy of the foregoing
upon all counsel of record in this action via email.

s/ Bruce McMullen
Bruce McMullen